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KEMRON Fort Sheridan
Environmental
Tetra Tech EM, Inc. Restoration Team

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Memo

To: Restoration Advisory Board (RAB)
From: Tracy Bergquist – KEMRON Environmental Services, Inc. (KEMRON)
Kurt Thomsen – Fort Sheridan Environmental Coordinator
Date: February 17, 2004
Re: Summary of Minutes from February 3, 2004, RAB Meeting

1. The Fort Sheridan RAB meeting convened at 7:00 p.m. on February 3, 2004, at the Hotel Moraine, 700 North Sheridan Road, Highwood, Illinois. The following individuals attended the meeting:

RAB Members

Judy Johnston, Co-Chair
Victor Bonilla, Co-Chair
Wolfgang Boerner, RAB Member
Michael Kuhn, RAB Member
Joyce O'Keefe, RAB Member
Brian Conrath, Illinois EPA
Kurt Thomsen, Fort Sheridan Environmental
Coordinator

Other Attendees

Dan Fleming, Navy
J. Blayne Kirsch, Navy
Tracy Bergquist, KEMRON
Larry Emerson, KEMRON
Mindy Gould, Tetra Tech
Rob Foster, Tetra Tech
Chaouki Tabet, U.S. Army

2. Before calling the meeting to order, Co-chair Johnston announced that one of the original RAB members, Jone Noyes, died in December and that her contribution would be missed.

3. Co-chair Johnston called the meeting to order then asked if there were comments or corrections to the August 26, 2003 RAB meeting summary. There were none, and the minutes were approved as written.

The RAB members questioned why they received a copy of the court reporter's transcript of the August 26, 2003, RAB meeting in the packet of information sent to them prior to the February 3 meeting, and they decided that receiving just the executive summary in the future would be sufficient.

The members requested that the names of presenters be included with agenda items in the future.

4. Co-chair Bonilla was asked to comment on the status of Landfill 1 (LF 1). Before the discussion, Mr. Pat Bolger from KEMRON explained that the proposed plan for LF 1 is undergoing review, and after the

review process is complete the plan will be sent to the RAB members for comments. There is an issue regarding how the LF 1 remedy construction will be funded, following approval of the proposed plan and subsequent decision document.

Co-chair Bonilla attended a budget review meeting during the last week of January. These are held twice a year, and during the meetings all groups involved in BRAC work are required to defend their budgets for the next three years. A question arose during the January 2004 meeting about the source of funding to be used for implementing the remedy for LF 1. There was a discussion among Army management staff regarding who should fund the LF 1 remedial action. The money could come from either BRAC funds or funds from the Office of the Director of Environmental Programs, and the funding could be in FY 2004, FY 2005, or 2 or 3 years in the future. No decision on the source of funding had been made by the time of the RAB meeting.

Co-chair Bonilla said that with its existing funds, the Army will prepare a draft proposed plan, submit the proposed plan for public, prepare a draft decision document following the comment period, send the draft decision document through internal review and address review comments, and leave the document in draft status until additional funding becomes available. The reason for this is that signing a decision document "triggers the CERCLA 15-to-18-month clock" to implement the decision. Because it is unknown whether funding would be available within 15 to 18 months to conduct the remedial action, finalizing the decision document would not be wise.

5. Co-chair Johnston said the RAB members thought that BRAC money had been set aside for remediating the entire Fort Sheridan property, and co-chair Bonilla said that was not the case and that LF 1 was not included in the original scope of the restoration work. The intent was that KEMRON would provide a final decision document for LF 1, and the Army Reserve would implement the remedial action. Co-chair Bonilla said that as soon as he finds out about the LF 1 funding, he will inform Mr. Thomsen who will then pass the information to the RAB members.

6. Mr. Bolger informed the group that KEMRON is moving forward on the LF 1 proposed plan. LF 1 will have an engineered barrier or cap similar to the one described in the LF 5 decision document and will be protected in the long term by land use controls (LUC). The tentative schedule would include a March 2004 public comment period on the proposed plan.

Mr. Brian Conrath, Illinois EPA (IEPA) clarified that the land in question is the off-base portion of LF 1, and IEPA does not consider LF 1 to be a "city dump," and Mr. Bolger confirmed that this is so.

7. RAB member Kuhn asked for confirmation that funding for LF 1 will be available, and co-chair Bonilla said that the funding will be available after the Army settles the question of which office will supply it, when it will be supplied (it could be 2 or 3 years), and that the amount involved is about \$2.2 million.

RAB member O'Keefe expressed concern about the Army's commitment to fund LF 1 remediation when the timing of the funding is so uncertain and wanted to know whether it would speed the process if the community expressed its desire to have the work completed sooner rather than later. Co-chair Bonilla said this issue can be raised during the public comment period for LF 1 in March 2004, and he will alert his headquarters to the public sense of urgency for funding to complete the LF 1 remediation; however LF 1 is not a BRAC priority because the property is not being transferred and it is considered property already disposed. The Army's funding priority is BRAC property that must be remediated prior to disposal.

8. Co-chair Johnston asked if additional Fort Sheridan property will be disposed of in BRAC 2005, and co-chair Bonilla said the schedule for further BRAC closures will be announced in May 2005.

9. RAB member O'Keefe asked who owns the off-site property that is being cleaned up in conjunction with LF 1. She was informed that it is owned by the City of Lake Forest.

10. Ms. Mindy Gould, Tetra Tech, presented an update on the status of the decision documents for Coal Storage Area 3 (CSA 3) and LF 5. There is one document covering both CSA 3 and LF 5, and the document is undergoing IEPA review. KEMRON sent the RAB members a notice that copies of the 50-60 page document can be made available to them for review, or they can request to receive the 2-page declaration section of the decision document via e-mail. After the decision document is finalized, the design document will be completed.

11. Mr. Larry Emerson, KEMRON, presented an update on the status of the design documents for CSA 3 and LF 5. The draft design document was in progress by Tetra Tech at the time of the meeting and was scheduled for joint R1/R2 review on February 10. The LF 5 design document was in progress and was scheduled for R1/R2 review on February 16.

12. Mr. Bolger presented an update on the progress at other sites on the Fort Sheridan property.

- Landfills 6 and 7 (LF 6 and LF 7): The landscaper finished work before the snow came, so there should be grass on LF 6 and prairie plants emerging on LF 7 in the spring. Erosion control fabric will hold the soil in place until the plants are established. LF 7 requires more topsoil and additional drainage work, and this will be completed in early spring as soon as the ground is dry enough.
- Landfill systems: The leachate collection and gas systems are now automated but are still being commissioned for optimum efficiency. A long-term operation and maintenance (O&M) plan will be published and available for review. Leachate is kept at the bottom of the landfill by the piping system and is still being trucked to Wisconsin for treatment and disposal. The leachate continues to be high in iron and dissolved solids, which is typical of water in the Fort Sheridan area. Approximately 1,500 gallons of leachate are pumped out of the landfill daily. No hazardous substances have been found in the leachate. Areas leaking storm water into the landfills are still being identified and fixed.
- Action memo sites: All work on these areas is complete. The areas will be used as open space/green area in the future.
- Co-chair Bonilla mentioned that the long-term O&M plans are being drafted, and he praised KEMRON's closure of LF 6 and LF 7. The entire cost of the LF6 and LF7 closure was about \$28 million.

13. RAB member O'Keefe asked who retains ownership of the remediated property. Mr. Dan Fleming, Navy, said that the Navy and the Army share joint ownership of LF 6. For any use of the land by a municipality or by the public, a formal request must be made to the commanding officer of the Great Lakes Naval Base and also to the Army Reserve. There is no guarantee that these requests will be granted because there are issues of liability and access that would have to be addressed before DoD property is made available to the public.

14. RAB member O'Keefe asked whether the property will eventually be transferred to another entity or put on the market if the security issues are resolved. Mr. Fleming said if a decision to transfer the property were made, all of the property, including LF 6 and LF 7, would likely be included. To Mr. Fleming's knowledge, there have been no formal public requests or inquiries about use of LF 6 or LF 7.

15. RAB member O'Keefe recalled that several years ago the park district and/or the City of Highland Park had an agreement with the Navy to transfer the ownership of the property for recreational use. Mr. Flemming said he is not aware of any document or formal request of public usage of the Fort Sheridan property. If there is

interest, now would be a good time to start the formal request process because it would take a year for the grass to get established so the land would not be available for at least a year.

16. RAB member Boerner asked whether the Navy was planning to build anything on the property. Mr. Fleming said that as far as he knew, the Navy has no plans to build.

17. Co-chair Johnston said she has heard rumors about changes to Navy housing, either improving or demolishing the current units, and she wanted to know about environmental remediation that would be needed for lead-based paint, asbestos, and other areas of concern. Would the current RAB have oversight of the process, or would it be a different advisory process?

- Mr. Fleming informed her that the existing RAB would continue to be used as the advisory board. The Navy would follow state and federal regulations for any construction or demolition activities. If privatization of the property occurred and the community wanted input on such activities, they could address comments to the Commander. There have been lots of rumors about the property; however, the Navy has no plans at this time.
- Mr. J. Blayne Kirsch, Navy, said the concern might be about a potential public/private housing venture. This is in its infancy and baseline environmental issues are just starting to be identified. He is not sure what role the RAB would play in this project. He suggested that any questions or concerns about the Navy property at Fort Sheridan be addressed to Captain Hobbs, the commanding officer of the Great Lakes Naval Station.
- Co-chair Johnston reiterated that she just wanted to know if the RAB would have any kind of environmental oversight in such a project and was told by Mr. Kirsch that the Navy would consider the RAB's comments if any remediation of the property is needed.

18. RAB member Kuhn recalled some concerns about the size of fill materials for LF 6 and LF 7 and wanted to know how the problem was resolved.

- Mr. Bolger explained that the original design specification called for fill material of "2-inch minus" to be put over a geosynthetic liner. Those are standard specifications, and those specifications did not account for the actual drainage fabric used. Penetration was not an issue with the actual fabric. Calculations showed that from an engineering standpoint penetration of the impermeable membrane by any size rock would not be an issue. Rather than relying on calculations alone, KEMRON started screening all fill material after receiving differing professional opinions on whether or not screening was necessary. There is a small part of LF 6 that might have rocks up to 6 inches that were placed prior to the quality control screening, but engineering studies show that these will not be a problem.
- Mr. Kuhn asked about independent QA/QC for the fill process, and Mr. Bolger confirmed that a third-party, independent engineering firm provided oversight as did a fourth party hired by the Army. This was a lengthier, thorough process than usual.
- Mr. Kuhn asked if the U.S. Environmental Protection Agency (US EPA) was on board at the time LF 6 was filled. Mr. Bolger said they were on board and brought up the question about the size of the fill along with many other issues to address. Mr. Bolger has already addressed these issues, and he does not know if US EPA concurs with the final outcome because the final report on LF 6 has not been submitted.

19. Co-chair Johnston asked for comments on US EPA's involvement in the RAB and the BCT.

Co-chair Bonilla said that due to funding cuts US EPA is no longer actively participating in the BCT or the RAB. The Department of Defense (DoD) has cut funding to different EPA regions. DoD emphasis now is on funding US EPA only if it is the lead regulatory agency, such as for sites that are on the national priority list (NPL). Fort Sheridan is not an NPL site or a Superfund site, so the lead regulatory agency in this case is IEPA.

Co-chair Bonilla called Army headquarters to get some funding reallocated to keep US EPA in the involved, but his request was denied. The Army sent a letter informing US EPA of the denied funding and extending an invitation to continue participating as a full member of the BCT and the RAB with the opportunity to review and comment on any documents produced. US EPA subsequently sent a letter stating that it will no longer review, comment, or concur with documents regarding Fort Sheridan.

20. Co-chair Johnston asked Mr. Conrath if IEPA has always been the lead agency for the Fort Sheridan work. He said IEPA has been the lead regulatory agency ever since the property transfer. When co-chair Johnston asked if this put more pressure on IEPA, Mr. Conrath told her that without US EPA input his own reviews will take longer to complete and he will be using other resources. His unit is completely federally funded through an agreement with DoD. The agreement is reworked every two years, and he anticipates the next contract will be funded at the same level as the present contract.

21. RAB member Kuhn said it was unfortunate that US EPA is no longer involved when there are still unresolved issues involving LUCs and size of fill material in LF 6 and 7

22. Co-chair Bonilla described the past disagreement the Army has had with US EPA about LUCs. The issue involved enforcement of LUCs. At the time, DoD policy leaned toward not using enforceable language in decision document when LUCs were part of a remedy. The guidance on this has now changed, and DoD has adopted the "Navy principles" for LUCs. This will allow the Army to fully comply with the issues raised by US EPA in regard to lack of enforcement of LUCs at Fort Sheridan. The LUC objectives will be memorialized in decision documents.

Co-chair Johnston recalled that one of the concerns in the past was the lack of enforcement language in regard to LUCs, and co-chair Bonilla said that this has been resolved to the satisfaction of the regulatory agencies.

Mr. Conrath said IEPA is working through the LUC MOA and is very close to signing off on it.

Mr. Flemming explained that the LUC disagreement between DoD and US EPA involved the Air Force and one region of US EPA. Because of that dispute, US EPA had refused to sign the document for Fort Sheridan, but DoD and US EPA have now come to an agreement on LUCs based on the Navy principle, but not on the Air Force principle. Co-chair Bonilla reminded the group that the Army is following the Navy principle for LUCs at Fort Sheridan.

23. RAB member Boerner wanted to know how the RAB can assist the Army to get US EPA involved with Fort Sheridan again. He feels US EPA did an excellent job and that project performance might suffer without US EPA presence.

Co-chair Bonilla suggested that the RAB contact the US EPA Region 5 regional administrator about their concerns over having no US EPA involvement in the Fort Sheridan remediation.

RAB member O'Keefe made a motion that the RAB send a letter to Tom Skinner expressing the board's appreciation for the work Owen Thompson did at Fort Sheridan, requesting that the US EPA find a way to fund its continuing presence in the Fort Sheridan work, and indicating that the interplay between US EPA and IEPA

was invaluable to the project. The motion passed. Members O'Keefe and Boerner will draft the letter. It will be included in the information packet distributed to RAB members before the next meeting.

24. Co-chair Bonilla told the group that DoD provides funds to US EPA Headquarters for providing oversight of the BRAC program, and US EPA Headquarters decides which EPA regions will receive those funds. Funds can be reallocated among the regions if US EPA feels it is necessary.

RAB member Boerner said he feels that since Fort Sheridan is a federally-owned property, US EPA should be involved. He added that the RAB's desire to have US EPA reinstated as a regulatory agency does not mean that KEMRON or the subcontractors are doing anything wrong.

25. Ms. Tracy Bergquist, KEMRON, told the RAB that KEMRON has tried to keep USEPA involved with the process, but the agency is not accepting delivery of any Fort Sheridan documents

26. Co-chair Johnston asked for additional comments.

RAB member Kuhn asked for clarification on DoD funding for US EPA. At one point in the discussion co-chair Bonilla said DoD was only funding NPL sites and he later said that funds were provided to US EPA headquarters and dispersed to the regions according to EPA determinations, so he wants to know which statement is accurate.

Co-chair Bonilla explained that the BRAC funding for US EPA was reduced this fiscal year so BRAC program management has also been reduced. The Army has places of special interest for which they provide funding for US EPA personnel. DoD provides funding to US EPA based on the number of people working in the field at DoD installations, most of which are NPL sites. When EPA receives the funds from DoD, it then becomes EPA money that the agency can reallocate in any way it wants, even when DoD specifies how the money should be spent. Co-chair Bonilla further explained that in some cases DoD is funding multiple agencies, not just US EPA, depending on the regulatory needs at each installation.

27. Co-chair Johnston asked about dates to be considered for the next RAB meeting.

Mr. Bolger said the public comment period for LF 1 has to be considered. The planned start date is March 1, 2004, with a public meeting held in the middle of the comment period.

The next BCT meeting will be Tuesday, March 30, 2004.

The next RAB meeting will be on Tuesday, March 30, 2004.

The meeting adjourned.